

SEYFARTH SHAW LLP
 William F. Dugan (*admitted pro hac vice*)/wdugan@seyfarth.com
 131 South Dearborn Street, Suite 2400
 Chicago, Illinois 60603
 Telephone: (312) 460-5000/Facsimile: (312) 460-7000

SEYFARTH SHAW LLP
 Eric M. Lloyd (*admitted pro hac vice*)/elloyd@seyfarth.com
 560 Mission Street, Suite 3100
 San Francisco, California 94105
 Telephone: (415) 397-2823/Facsimile: (415) 397-8549

MORRIS LAW GROUP
 Ryan Lower (SBN 9108)/rml@morrislawgroup.com
 900 Bank of America Plaza
 300 South Fourth Street
 Las Vegas, Nevada 89101
 Telephone: (702) 474-9400/Facsimile: (702) 474-9422

Attorneys for Defendant
 STERLING JEWELERS INC.

SCHUETZE & MCGAHA, P.C.
 William W. McGaha/dkb@smlvlaw.net
 Joshua Santeramo/ jms@smlvlaw.net
 601 S. Rancho Drive, Suite C-20
 Las Vegas, NV 89106
 (702) 369-3225/(702) 369-2110 (facsimile)

Attorneys for Plaintiff
 LAWRENCE COLLINS

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

LAWRENCE COLLINS, an individual)	Case No. 2:14-cv-01997-JCM-GWF
)	
Plaintiff,)	STIPULATED REQUEST FOR
)	DISMISSAL WITH PREJUDICE AND
v.)	[PROPOSED] ORDER
)	
STERLING JEWELERS INC., a foreign)	Action Filed: 12/2/14
Corporation; DOES I through X inclusive, and)	
ROES CORPORATIONS XI through XX,)	
inclusive,)	
)	
Defendants.)	
)	

1 Plaintiff Lawrence Collins ("Plaintiff") and Defendant Sterling Jewelers Inc.
2 ("Defendant") (collectively the "Parties"), by and through their respective counsel, and pursuant
3 to Federal Rule of Civil Procedure Rule 41(a)(2), hereby notify the Court that they have entered
4 into a written settlement agreement and hereby stipulate to a voluntary dismissal, with prejudice,
5 of all claims asserted against Defendant in the above-captioned matter. The Parties further
6 stipulate that each party shall bear its own attorneys' fees and costs of suit.

7 WHEREFORE, the Parties request that the Court enter an Order dismissing the above-
8 captioned action with prejudice.

9 **IT IS SO STIPULATED.**

10 DATED: September 24, 2015

SEYFARTH SHAW LLP

11
12 By /s/ Eric M. Lloyd
13 William F. Dugan
14 Eric M. Lloyd
Attorneys for Defendant
STERLING JEWELERS INC.

15
16
17
18 DATED: September 24, 2015

SCHUETZE & MCGAHA, P.C.

19
20 By /s/ Joshua Santeramo
21 William W. McGaha
Joshua Santeramo
22 Attorneys for Plaintiff LAWRENCE COLLINS

23 I hereby attest that all signatories indicated by a conformed signature (/s/) have concurred in the
24 filing of this document.

25 /s/ Eric M. Lloyd
Eric M. Lloyd

[PROPOSED] ORDER

Pursuant to the Parties' stipulation, the above-captioned action is hereby **DISMISSED**
WITH PREJUDICE. Each party shall bear its own attorneys' fees and costs of suit.

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: October 5, 2015

CERTIFICATE OF SERVICE

1. On September 24, 2015, I served the following document:

STIPULATED REQUEST FOR DISMISSAL WITH PREJUDICE AND [PROPOSED] ORDER

2. I served the above-named document(s) by the following means to the persons as listed below:

(Check all that apply)

☒ **a. ECF System**

☐ **b. United States mail, postage fully prepaid on _____:**

☐ **c. Personal Service**

(List persons and addresses. Attach additional paper if necessary)

☐ For a party represented by an attorney, delivery was made by handing the document(s) to the attorney or by leaving the document(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the document(s) in a conspicuous place in the office.

☐ For a party, delivery was made by handing the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

☐ **d. By direct email (as opposed to through the ECF System)**

(List persons and email addresses. Attach additional paper if necessary)

Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ **e. By fax transmission**

(List persons and fax numbers. Attach additional paper if necessary)

Based upon the written agreement of the parties to accept service by fax transmission or a court order, I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

☐ **f. By messenger**

(List persons and addresses. Attach additional paper if necessary)

I served the document(s) by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a messenger for service. *(A declaration by the messenger must be attached to this Certificate of Service).*

I declare under penalty of perjury that the foregoing is true and correct.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Signed on September 24, 2015.

/s/ Nancy J. Davilla
an employee of Seyfarth Shaw LLP

I hereby attest that all signatories indicated by a conformed signature (/s/) have concurred in the filing of this document.

/s/ Eric M. Lloyd
Eric M. Lloyd